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JOHN J. COTA

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
13

14 UNITED STATES OF AMERICA,
15
Plaintiff,
16
v.
17 JOHN J. COTA,
and
18 FLEET MANAGEMENT, INC.
19 Defendant.

Case No. CR 08-0160 SI

**[Proposed] PROTECTIVE ORDER
GOVERNING DISCOVERY MATERIAL**

20
21 This matter coming before the Court pursuant to Defendant John J. Cota's ("Captain
22 Cota") Status Conference Statement, and the Court being fully advised in the premises:

23 IT IS HEREBY ORDERED THAT:

24 With respect to any records pertaining to defendant John Cota:

25 1. The government shall redact any and all Personal Identifying Information ("PII")
26 including, but not limited to Captain Cota's home address, telephone numbers, social security
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number, and date of birth, from any and all documents it produces in discovery to defendant Fleet Management, Inc. (“Fleet”).

2. In addition, any materials provided by the government to Fleet containing any unredacted PII and any documents or other materials pertaining to Captain Cota's medical history ("Medical History Materials"), and personnel or licensing matters ("Licensing Materials") shall be for attorney's eyes only. No copies of Medical History Materials or Licensing Materials shall be shown to or provided to any person other than counsel for defendant Fleet working on this matter absent a further Order of this Court.

3. Intentional violation of this Order shall be punishable as a contempt, and may result in the imposition of civil and criminal sanctions.

It is so Ordered.

Honorable Susan Illston
United States District Court Judge

Dated: _____, 2008

PROOF OF SERVICE

I am employed in the County of San Francisco, State of California by a member of the Bar of this Court, at whose direction this service was made. I am over the age of 18 and not a party to the within action. My business address is 55 Second Street, Suite 1700, San Francisco, CA 94105. On August 15, 2008, I served the document(s) described as:

[Proposed] PROTECTIVE ORDER GOVERNING DISCOVERY MATERIAL

on the parties to this action named on the attached service list by the method described below.

(BY PERSONAL SERVICE) I caused a true and correct copy of said document(s) to be served by hand to the addressee(s) listed above, with the name and address of the person served shown on the envelope.

(BY OVERNIGHT DELIVERY) I enclosed a true and correct copy of said document(s) in an envelope/package provided by an overnight delivery carrier addressed to the addressee(s) listed above, sealed it, and placed it for collection and overnight delivery following the ordinary business practices of Kirkpatrick & Lockhart Preston Gates Ellis LLP. I am readily familiar with the firm's practice of collecting and processing correspondence for overnight delivery. On the same day that correspondence is placed for collection and overnight delivery, it is collected by an overnight delivery carrier. Delivery fees are pre-paid or provided for in accordance with the ordinary business practices of Kirkpatrick & Lockhart Preston Gates Ellis LLP.

X (BY ELECTRONIC TRANSMISSION) I transmitted a true and correct copy of said document(s) by electronic mail to the offices of the addressee(s). I did not receive, within a reasonable time after the transmission, any message or other indication that the transmission was unsuccessful.

(BY FACSIMILE) I transmitted a true and correct copy of said document(s) by facsimile to the offices of the addressee(s). Upon completion of the facsimile transmission, a transmission report was issued showing the transmission was complete and without error.

(BY U.S. MAIL) I enclosed a true and correct copy of said document(s) in an envelope addressed to the addressee(s) listed above and placed it for collection and mailing following the ordinary business practices of Kirkpatrick & Lockhart Preston Gates Ellis LLP. I am readily familiar with the firm's practice of collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the U.S. Postal Service with postage fully prepaid at San Francisco, California.

Executed on August 15, 2008 at San Francisco, California.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Mae A. Chu
Mae A. Chu

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